

NAHRGANG & ASSOCIATES, P.C.  
BY: MATTHEW R. NAHRGANG, ESQUIRE  
ATTY. I.D.: 60051  
35 Evansburg Road  
Collegeville, PA 19426  
(610)489-3041  
E-Mail mnahrgang@verizon.net

---

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: HUGO ACUNA  
Debtor

:  
: NO. 22-12786  
:  
: CHAPTER 13

**MOTION OF HOSAM ZAROOR FOR INSTANT AND PROSPECTIVE RELIEF  
FROM THE AUTOMATIC AND CODEBTOR STAY**

Movant, by and through his attorney, Matthew R. Nahrgang, Esquire, files this Motion for Relief and, in support thereof, avers the following:

1. On or about October 18, 2022, Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. Debtor and codebtors, Nina Dione Acuna Strother, and Adriana Arias had been tenants in Movant's property with an address of 1417 Stockton Road, Coatesville, PA 19320 ("the premises"). The lease converted to month to month by its terms on June 1, 2019. However, Debtor and codebtors have been delinquent for months and Movant sought to terminate due to default and desirous of a new tenant. Movant was in the process of evicting Debtor and codebtors when he learned of the bankruptcy filing. Hence the instant Motion.

3. Debtor and codebtors currently occupy the premises and have not paid rent for months. Accordingly, Movant seeks to exercise his state law rights and respectfully requests Relief under both 11

USC 362 and 11 USC 1301 instantly and prospectively as there would be no good faith basis for a stay of eviction regarding any future filing.

4. Movant respectfully submits the foregoing is cause for granting Relief and seeks an Order that such Relief shall apply to any future bankruptcy filed by the Debtor or codebtors.

WHEREFORE, Movant respectfully requests that this Court enter an Order granting the Motion.

Respectfully submitted,  
*/s/ Matthew R. Nahrgang*

---

Matthew R. Nahrgang  
Attorney for Movant